

AFFIDAVIT OF SHEILA M. O'HARA

I, Sheila M. O'Hara being duly sworn, do depose and state that:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been an ATF Special Agent for over 29 years, and during that time I have been involved in numerous investigations of violations of federal firearms and narcotics laws. I am currently assigned to a group in the Boston Field Division of ATF that, in part, works with other Federal, State and local police departments in and around the Southeastern Massachusetts area to investigate and prosecute violations of the federal firearms, explosives and narcotics laws.
2. Based on my training and experience as an ATF Special Agent, I am familiar with federal firearms and narcotics laws and know that it is a violation to Title 18, United States Code, Section 922(g)(1), to be a felon in possession of a firearm that has previously traveled in interstate commerce and Title 21, United States Code, Section 841(a)(1), to be in possession of a controlled substance with intent to distribute.
3. I submit this affidavit in support of a criminal complaint charging Douglas NORRIS (DOB xx/xx1979) (NORRIS) with being a felon in possession of a firearm, to wit, a Smith & Wesson, model 6906, 9mm pistol, bearing serial number VZC1429, and with possession of a controlled substance with intent to distribute.
4. The facts herein are based on my involvement in this investigation, a review of reports written by other law enforcement officers during this investigation, and my conversations with those officers. In submitting this affidavit, I have not included every fact known to me regarding this investigation. Instead, I have included only those facts which I believe are sufficient to establish probable cause.

5. On Tuesday, June 20, 2017, at approximately 5:00 AM, the Brockton Police Department executed a “no knock” state search warrant for narcotics at 145 North Warren Avenue, Apartment 2A, Brockton, MA, the residence of NORRIS. In a backpack located in a closet in one of the bedrooms, investigators found, among other items, a loaded Smith & Wesson, model 6906, 9mm pistol, serial number VZC1429, and various rounds of assorted ammunition; one bag containing approximately 48.2 grams of suspected crack cocaine; one bag containing approximately 31.8 grams of suspected powder cocaine; and 1 bag containing approximately 2.5 grams of suspected powder cocaine. Investigators also found, among other things, 2 digital scales with white residue on a shelf in the closet. Investigators also found evidence of narcotics dealing elsewhere in the bedroom and in the apartment, including one bag containing approximately 12.2 grams of suspected crack cocaine and one bag containing approximately 18.7 grams of suspected powder cocaine, both of which were located in a box for wine glasses on top of a cabinet near the sink in the kitchen. The suspected narcotics all field-tested positive for cocaine.
6. NORRIS was not present during the execution of the state search warrant. A total of three adults and one infant were in the apartment at the time the search warrant was executed. The infant was identified as Douglas Norris, Jr. (DOB 2016) and his mother Nakaita Brown, who was identified as the girlfriend of NORRIS. After being advised her Miranda Rights, Brown told officers that she did not know where NORRIS was at that time. She further advised that she did not reside in the apartment and that she just shares custody of their child. She said that the apartment is NORRIS’s apartment. Brown and Norris, Jr., were both located in a bedroom that contained mail bearing Douglas NORRIS’s name and bearing the address of the 145 North Warren Avenue apartment. The bedroom

appeared to contain only male clothing and footwear. This is the bedroom in which investigators found, in the closet, the backpack containing the loaded Smith & Wesson pistol and the three bags of suspected narcotics, and, on the shelf, the two digital scales with white residue. The other two adults were in a different bedroom when the police entered the apartment.

7. At approximately 7:50 AM, NORRIS was observed walking from 145 North Warren Avenue and approaching a motor vehicle that NORRIS had been known to operate. It was also known that NORRIS did not have a valid driver's license. NORRIS was subsequently stopped by Brockton PD. Officers approached the motor vehicle that was operated by NORRIS and asked NORRIS for his driver's license. NORRIS immediately stated, "I am the one you are looking for." NORRIS was subsequently arrested.
8. The Brockton Police had twice, in the previous months, received calls concerning the apartment. Specifically, on November 24, 2016, Brown called police for a welfare check at the apartment concerning NORRIS and Douglas Norris, Jr. On January 9, 2017, the police responded to a call of a domestic disturbance at the apartment and NORRIS was present in the apartment. In addition, at approximately 4:00 p.m. on June 15, 2017, a Brockton detective observed NORRIS come out of 145 North Warren Avenue and enter a car. NORRIS started the car and remained in it a short time, and he then went back inside 145 North Warren Avenue.
9. A detailed trace of the Smith & Wesson pistol revealed, among other things, that the firearm traveled in interstate commerce when it was shipped from Massachusetts to the Kittery Trading Post, Kittery, ME in January, 1997.

10. A review of NORRIS's criminal record revealed that on July 27, 2005, he was convicted in Suffolk Superior Court of Armed Robbery, Possession of a Firearm and Ammunition, and Assault and Battery (A&B) With a Dangerous Weapon, and received 7-9 years for the Armed Robbery, 4-5 years for the firearms charge, and 3 years' probation from and after his sentence for the A&B charge.

11. Based on the foregoing facts, I believe there is probable cause to believe that on or about June 20, 2017, Douglas NORRIS, subsequent to a conviction of a crime punishable by imprisonment for a term exceeding one year, did possess a Smith & Wesson, model 6906, 9mm pistol, bearing serial number VZC1429, which had previously been shipped or transported in interstate commerce, in violation of 18 U.S.C. § 922(g)(1), and did possess a controlled substance, cocaine, with intent to distribute in violation of Title 21, United States Code, § 841(a)(1), all in the City of Brockton, Massachusetts.



Sheila M. O'Hara, Special Agent
Bureau of ATF

Sworn and subscribed to before me this 17 day of July, 2016



HON. DONALD L. CABELL
United States Magistrate Judge

